

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTERFOCUS INC., a California Corporation,

Plaintiff,

v.

The Defendants Identified in Schedule A,

Defendants.

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

DEFENDANTS' PARTIAL MOTION TO DISMISS UNDER RULE 12(b)(6)

Defendants Hangzhou Hibaby Technology Co., Ltd. and Hibobi Technology Limited, (“Hibobi” or “Defendants”), pursuant to Federal Rules of Civil Procedure 12(b)(6), respectfully move this Court for an Order dismissing Plaintiff Interfocus Inc.’s (“Plaintiff”) copyright claim (Count I) against Defendants because Plaintiff does not sufficiently plead “copying”. The arguments in support of this Motion are set out in the concurrently filed Memorandum in Support.

Dated: October 28, 2022

Respectfully submitted,

/s/ Ziyong Li

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CERTIFICATE OF SERVICE

I certify that, on October 28, 2022, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's CM/ECF system.

/s/ Ziyong Li

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